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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

SFUND RECORDS CTR  
2065593

Jeffery C. Morris, PE  
CH2M Hill  
156 Grand Avenue  
Suite 1000  
Oakland, CA 94612

NOV 14 2003

Re: October 22, 2003 notice of 40 CFR 761.61(a) cleanup plan Building 84 , in Investigation Area D1, Eastern Early Transfer Parcel, Mare Island, Vallejo, California

Dear Mr. Morris:

EPA has reviewed your October 22, 2003 notice of 40 CFR 761.61(a) cleanup plan Building 84 , in the Eastern Early Transfer Parcel, Mare Island, Vallejo, California. EPA does not approve the plan.

Building 84, the former marine prison, has oily stains on the asphalt floor that were found to contain PCBs, although the source of the contamination is unknown. In 1995 SSPTS collected 42 stain specific solid and wipe samples from noted stained areas. 33 of the samples were reported as non-detect for PCBs. However, the reporting limits were 10 ug/100 cm<sup>2</sup> for the wipe samples and 2 mg/kg for the solid samples. These reporting limits are at or in exceedence of the default Substantive Cleanup Requirements of 10 ug/100 cm<sup>2</sup> or 1 mg/kg goal specified in paragraph 8(a) of the Consent Agreement /Final Order. It is therefore not possible to determine if the cleanup proposed by CH2M Hill will adequately remove all of the PCB contamination present within the building.

Considering that the source of the contamination is also unknown, and that the floor is of asphalt composition, it may be that the PCBs were present in the oil that was used to make the floor material. In addition to the sampling required to verify the previous sample locations meet the cleanup goal of 1 mg/kg, samples should also be collected from unstained areas of the floor to determine that the asphalt itself does not contain PCBs.

Please feel free to contact EPA staff Emily Roth (415-972-3175) or Carolyn d'Almeida (415-972-3150) if you have any questions.

Sincerely,

*Paula Bisson*

Paula Bisson  
Manager  
Toxics Office

c.c. Henry Chui, DTSC